

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 23-60782-SINGHAL**

MORGAN M. SACCONI,

Plaintiff,

v.

CARSTRADA, INC., *et al.*,

Defendants.

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**MOTION FOR DEFAULT AGAINST DEFENDANT**  
**CARSTRADA, INC.**

Plaintiff, MORGAN M. SACCONI, (“Plaintiff”) files this Motion for Default as to Defendant, CARSTRADA, INC., a Florida corporation (“Defendant”), and states:

1. As Plaintiff was unable to effectuate service of process by delivering the summons and the Complaint to Defendant via a process server, it was determined that the proper method of service in this action was to perfect substituted service upon the Secretary of State, pursuant to Fla. Stat. § 48.081(4) (2023) and this Court entered an Order authorizing substitute service. [DE 15].

2. On June 30, 2023, the Clerk issued a summons for Defendant to be served upon the Secretary of State. [DE 17].

3. On July 06, 2023, pursuant to Fla. Stat. § 48.081(4) Plaintiff effectuated service of process upon the Defendant through the Online Service of Process portal of the Secretary of State.

4. As of the date of this Motion, Defendant has failed to respond despite being duly served.

5. Accordingly, Plaintiff respectfully submits that she is entitled to the entry of a default against Defendant pursuant to Rule 55(a) of the Federal Rules of Civil Procedure.

6. Plaintiff has served a copy of this Motion upon Defendant via U.S. Mail.

**WHEREFORE**, Plaintiff, MORGAN M. SACCONI, respectfully requests that a default be entered against Defendant, CARSTRADA, INC. and for such other and further relief as the Court may deem proper and just.

Dated: July 28, 2023

/s/ Joshua E. Feygin  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 28, 2023, I electronically filed the foregoing document with the Clerk of Court for the U.S. District Court, Southern District of Florida, using the CM/ECF system, and that the foregoing document was served electronically to all counsel of record and a copy was mailed by USPS first class mail to: CARSTRADA, INC. c/o its registered agent – SIGAL, LILYA 6023 HOLLYWOOD BLVD. HOLLYWOOD, FL 33024.

/s/ Joshua E. Feygin  
JOSHUA FEYGIN, ESQ.  
FL Bar No.: 124685